

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ANTOINE MANSON
PLAINTIFF

VS.

B&S TRUCKING OF JACKSON, LLC
AND MARIEL A. ARIAS-PADILLA
DEFENDANTS

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5:21-CV-01181-XR

**DEFENDANTS' AMENDED AND SUPPLEMENTAL
PROPOSED DEPOSITION OFFERS**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Now come Defendants B&S TRUCKING OF JACKSON, LLC and MARIEL A. ARIAS-PADILLA and file their amended and supplemental proposed deposition offers of the witnesses identified below and would respectfully as follows:

I.

1. Officer Adam Martinez

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2. Dennis Gutzman, M.D.

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3. Irmo Marini, PhD

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4. Russell Gill

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5. Bogdan Sieczkowski

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6. John Swiger

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7. C. Stuart Pipkin III, M.D.

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8. Stephen Earle, M.D.

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9. Antoine Manson

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10. Marisel Arias-Padilla (August 6, 2022)

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11. Mariel Arias-Padilla (October 27, 2023)

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12. Rodney Ellis

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II.

Defendants reserve the right to supplement or amend their proposed deposition offers. Defendants further reserve the right to offer rebuttal and impeachment deposition testimony.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served via the Court's Case Management/Electronic Case Filing (CM/ECF) system to the following counsel of record on the 26th day of November, 2024:

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